

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

RECEIVED

JOSEPH W. HIGGINS, PLAINTIFF,

OCT 06 2011

V.

civil action: 3:11-cv-01821-PGS-TJB
AT 8:00
WILLIAM T. WALSH
CLERK

STEPHEN J. BERNSTEIN, ET AL.,

AMENDMENT TO THE MOTION FOR TEMPORARY RESTRAINING ORDER

The plaintiff hereby repeats and realleges and incorporates by reference the allegations in all paragraphs hereforth mention in above dockets with the same force and effect as if herein set forth.

As to page 11 note statement: Latasha Solomon lives with the plaintiff at 311 summer ave, Newark nj 07104. The kids were taken from this home. Latasha Solomon have reviewed, read, understands and agrees with all of plaintiff's efforts on file in this case and all the dockets presented in this matter. Dr. Alexander Iofin is the Dr. referred to in the Motion for TRO. See his rating: http://www.vitals.com/doctors/Dr_Alexander_Iofin.html#reviews

Latasha Solomon agrees that Dr. Iofin is fabricating Latasha's condition in order to use this as evidence to take Latasha Solomon's Kids. The rating will show that this Dr. Has a pattern of fabricating reports as a sole bases to wrongfully commit: State Sanction Kidnapping.

2011 OCT - 3 AM 11:44

U.S. DISTRICT COURT

We Joseph W. Higgins And Latasha Solomon do declare and swear
under penalty of perjury that all above is true and correct.

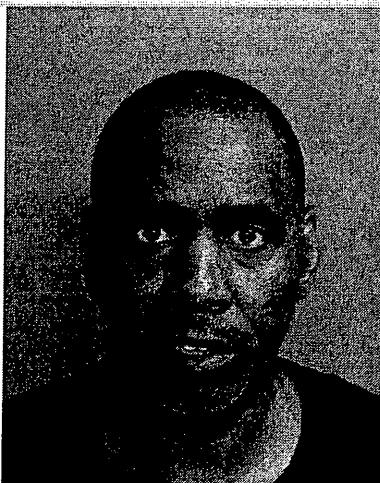
Joseph W. Higgins
Joseph W. Higgins
311 Summer Ave #2
Newark Nj07104

Latasha Solomon
Latasha Solomon Oct 1, 2011
311 Summer Ave #2
Newark Nj 07104

U.S. DISTRICT COURT
2011 OCT - 3 AM 11:44

2

Name: JOSEPH HIGGINS



Sex: M
DOB: Sep 10, 1958
Height:
Weight: 190 POUNDS
Race:
Hair Color: BLACK
Hair Length:
Eye Color: BROWN

Complexion:

Inmate Information:

Marital Status:		SBI#:	654559E
FBI:	366953CA1	State Prison#:	
Photo ID:	J201107497	CCIS#	07-40984C
Citizen:		COB:	

Incarceration Information:

Housing Section:		Housing Block:	
Cell:		Bed:	
Commitment Date:	04/22/2011	Release Date:	08/05/2011

Alias Information:

There are no aliases for this inmate.

Bond Information:

Type: Amount: \$15,000.00 Status: Dismissed Posted By: Post

Detainer Information:

There is no detainer information for this inmate.

Charge Information

Case #	Description	Grade	Off Dat
	THREAT TO KILL		04/22/2
Comm Date	Dis Date	Conv Date	Sent Date
			0 Y, 0 M

Case #	Description		Grade	Off Dat
	THREAT TO KILL			04/22/2
Comm Date	Dis Date	Conv Date	Sent Date	Sentenc
	08/04/2011			0 Y, 0 M

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COMPLAINT - SUMMONS

COMPLAINT NUMBER			
0714	S	2010	001332
COURT CODE	PREFIX	YEAR	SEQUENCE NO.

NEWARK MUNICIPAL COURT
31 GREEN STREET
NEWARK NJ 07102
(973) 733-6520 COUNTY OF: ESSEX

of CHARGES 2 CO-DEFTS POLICE CASE #: 09-88461

COMPLAINANT LATASHA SOLOMON
NAME: 624 MARTIN L. KING BLVD
APT 3
NEWARK NJ

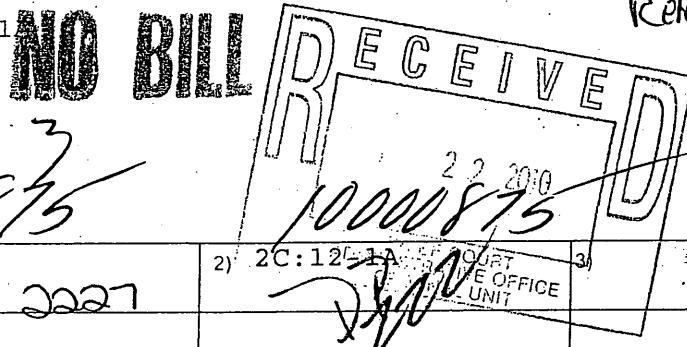
THE STATE OF NEW JERSEY
VS.
JOSEPH W HIGGINS
ADDRESS: 311 SUMMER AVE
2ND FLOOR
NEWARK NJ

DEFENDANT INFORMATION
SEX: M EYE COLOR: BROWN DOB: 09-10-1958
DRIVER'S LIC. #: SOCIAL SECURITY #: SBI #: DL STATE:
TELEPHONE: *for whom / Beckman*

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 11-23-2009 in NEWARK CITY, ESSEX County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY AND PURPOSELY COMMIT THE ACT OF TERRORISTIC THREATS SPECIFICALLY BY: TELLING THE COMPLAINANT (LATASHA SOLOMON) HE WOULD CUT THEIR 9 MONTH OLD FINGERS OFF. IN VIOLATION OF N.J.S. 2C:12-3A

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY AND PURPOSELY COMMIT THE ACT OF SIMPLE ASSAULT SPECIFICALLY BY: GRABBING THE COMPLAINANT BY HER NECK ATTEMPTING TO CHOKE HER.

IN VIOLATION OF N.J.S. 2C:12-1



in violation of:

Original Charge	1) 2C:12-3A	2) 2C:12-1	COURT CLERK'S OFFICE UNIT	3)
Amended Charge				

CERTIFICATION:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

Signed: *GERMAINE POYOTTE*

GERMAINE POYOTTE

01-16-2010

Date:

The complaining witness is a law enforcement officer and a judicial probable cause determination is not required prior to the issuance of this Complaint-Summons.

SUMMONS:

YOU ARE HEREBY SUMMONED to appear before this court to answer this complaint. If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

DATE TO APPEAR: 02-05-2010 TIME: 8:30am

GERMAINE POYOTTE

01-16-2010

Signature of Person Issuing Summons

Date

Domestic Violence - Confidential

Related Traffic Tickets or Other Complaints

Serious Personal Injury/ Death Involved

Special conditions of release:

- No phone, mail or other personal contact w/victim
- No possession firearms/weapons
- Other (specify):

ORIGINAL

TONYA YOUNG

DEPT. OF CHILDREN AND FAMILIES
INTER-OFFICE COMMUNICATION

286567

TO: Modeyah/Cleo Date: 8/19/11

FROM: Joanne Reed
Newark Adoption Office

SUBJECT: Case Name: Solomon
NJS Number: 10117043

Please be advised that the above named case is scheduled for an Initial Return date on the Order to Show Cause on the Complaint for Guardianship on 9/28/11 at 1:30pm before Judge Stephen J. Bernstein, Superior Court of New Jersey, 212 Washington Street, 10th floor, Newark, N.J.

No materials were sent to Document Research Service for service upon Latasha Solomon (mother), Greg Boyd (father), Everett Coleman (father), Kareem Johnson (father), Joseph Higgins (father), or Mannix D. Washington (father) because their whereabouts are unknown to the Division.

Attached is a copy of the Order to Show Cause, Complaint for Guardianship, and Attachments. Please note that if, at the time of the Guardianship Hearing, all the appropriate parties (parents) have been properly served and have not appeared, the Court may hold those parents in default.

Please see me if you have any questions.

cc: Paralegal

EVIDENCE TO THE GRAND JURY THAT MR. JOSEPH W. HIGGINS IS INFAC
T INNOCENT OF ALL CRIMES AGAINST HIM

9-11-010

JOSEPH HIGGINS

USAM.

COUNTY OF ESSEX

P NO: 10000875

CC NO.

RECEIVED

JUN 21 2010

PATRICIA K. COSTELLO, A.I.S.C.

TO: MEMBERS OF THE GRAND JURY
SWORN AFFIDAVIT OR DECLARATION OF TRUTH

FROM: LATASHA SOLOMON
624 MARTIN LUTHER KING BOULEVARD, APT 3
NEWARK NJ 07102

BEFORE ME, the undersigned authority, personally appears LATASHA SOLOMON who, after being first duly sworn and cautioned upon her oath, deposes and states: The following below words by me is not being done under being coerced or placed under duress.

1. My name is Latasha Solomon, I live at 624 Martin luther king blvd, Newark, Nj 07102 #3, USA. I was born in Newark New Jersey, USA on March 12, 1982, and i am not a victim in this matter. Joseph W. Higgins has never hit me nor threaten my kids.

2. I am competent to testify, and have personal knowledge in the matter. On Nov 29, 2009, I went to the Newark Police Department and filed a civil complaint against Mr. Higgins. All the words said by me and explained to the police and the domestic violence court Judge Moore involving FV-07-001511-10; Police no. 09-88461 were false and not true. In addition, the actual words said about Mr. Higgins that i was willing to sign to under oath on Nov 29, 2009 is hereby attach to this writing as evidence of conflicting stories with respect to any alleged injuries alleged.. Namir was 11 months old on Nov 23, 2010, the alleged offense date. I talk to Gegg Brown for first time June 18, 2010, explaining what is being explained in this sworn affidavit. It is noteworthy that i never went to any hospital claiming injuries and was pregnant with Mr. Higgins child on Nov 23rd 2009. On Dec 1, 2009, The Domestic Violence shelter i went to was because Dyfus threaten to take my kids if i didn't go.

3. On Nov 29, 2009, I went to the Newark District Police Department about an offence committed Nov 23, 2009, emotionally distressed and upset in thinking that Mr. Higgins and this other lady friend contacted the youth and family services on me with false intent to cause this Dyfus program to wrongfully take custody of my kids. See attach referral. I used Nov 23rd as the offence date because i knew he could justify is whereabouts on Nov 29, 2009. Not thinking, and emotionally upset, i went to the Newark Police department and made a false report on him.

4. It was after Nov 29, 2009, when i found out that it was not Mr. Higgins or his friend that made this call to Dyfus. So on Jan 5, 2010, i moved the court for a order of Dismissal. See attach order of Dismissal of the civil complaint and TRO. In fact, the prosecution was even told back then that Mr. Higgins was actually innocence of the civil

that the case was dismissed for lop- lack of prosecution. See below page of the Order of Dismissal. Its shows, it is further dismiss for lop. The Court contacted me and i told them the matter was not true. See attach dismissal order, next to x mark, dated Jan 5, 2010.

5. Not only did i find out that Mr. Higgins never made this call, but i also found out that it is actually Mr. Higgins who have discovered that Dyfus and youth and family services have been blotting to devise a scheme to falsely take legal custody of my kids. And it has been Mr. Higgins, who have been protecting me from the abrutry intrusion by this family court Government. See attach U.S. Attorney Office letter dated June 3, 2010. requiring federal ctiminal investigation by the FBI.

6. After the Dismissal of the civil Complaint Jan 5, 2010, i declare upon personal knowledge that i never ever went back to the Government and signed, filed, or seeked a criminal prosecution against Mr. Higgins. Infact, i have never filed, signed, or seeked criminal prosecution against Mr. Higgins in life. And this civil complaint of Nov 29, 2009 was the first and only complaint i ever reported on Mr. Higgins with the Government and i was wrong when i did this. Upon information and belief, Me and Mr. Higgins believe that the issue date for this criminal complaint before the Grand Jury is Jan 16, 2010. I was never in contact with nobody on Jan 16, 2010 about Mr. Higgins in relation to a criminal case or any case. Jan 16, 2010 was a Saterday. See attach NJ automated complaint system complaint inquiry. Mr. Higgins proved that allegation about Jan 16, 2010 was false in a court hearing held June 4, 2010. And the court ordered the Division to strike all language pertaining to Jan 16, 2010 off the discovery of there file. See attach June 4, 2010 order.

7. Upon information and belief, Me and Mr. Higgins believes that it is Dyfus who started and is promoting the prosecution of this case after i dropped the Civil Complaint Jan 5, 2010. By picking this back up Jan 16, 2010. I state upon information and belief: Dyfus is using this prosecution as a bases or substance to claim immediate danger in taking legal custody of my kids. This is why the U.S. Attorney office is seeking federal investigation in the matter. See attach U.S. Attorney Letter..Lead FBI investigator Mareen Costello, phone number 973-792-3334. Open investigation is also with The U.S. Department of Justice in Washington, civil right criminal division. I have had a personal interview with Ms. Costello about the matter not being true about Mr. Higgins.

CERTIFICATION

8. I, Latasha Solomon solemnly declare or swear under oath that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, i am subject to punishment.

(STATE OF NEW JERSEY)

ss:

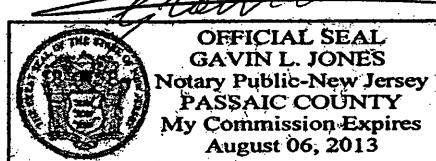
(COUNTY OF ESSEX)

Sworn to and subscribed before me this 21st day of July 2010, by LATASHA SOLOMON, who personally appeared before me, is personally known to me or produced State of New Jersey ID as identification, and did take an oath.

Latasha Solomon

624 Martin Luther King Blvd #3
Newark Nj 07102

x Latsha Sol



Case 3:11-cv-01821-PGS-TJB